

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT COURT OF PENNSYLVANIA

IN RE: : CHAPTER 13
MARY ELLEN RICHARDSON : CASE NO 5-18-00932
Debtor :

DEBTOR'S ANSWER TRUSTEE'S MOTION TO CONVERT CASE

AND NOW COMES, Mary Ellen Richardson, the Debtor, and files an Answer to the Chapter 13 Trustee's Motion to Convert Case and states the following:

1. Mary Ellen Richardson, (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Charles J. DeHart, III, Esquire. is the standing Chapter 13 Trustee.
3. The Trustee has filed a Motion to Convert case with the Bankruptcy Court due to the delay in the Debtor filing an Amended Chapter 13 Plan.
4. Debtor's Counsel is attempting to contact the Debtor to ascertain the status of the life insurance proceeds, as well as the sale of the liquor license.

WHEREFORE, the Debtor respectfully requests that the Trustee's Motion to Convert Case be denied.

Respectfully submitted,

Date: May 7, 2019

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID# 59887
381 N. 9th Avenue
Scranton, Pa 18504
(570) 347-7764

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 7, 2019, he caused a true and correct copy of Debtor's Answer to Trustee's Motion to Convert Case to be served via electronic filing in the above-referenced case, on the following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

Dated May 7, 2019

/s/Tullio DeLuca
Tullio DeLuca, Esquire